

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

Hon. Anita B. Brody

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Plaintiffs,

v.

National Football League and
NFL Properties LLC,
successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**CO-LEAD CLASS COUNSEL'S MOTION FOR AN ORDER
(1) SANCTIONING THE CAMBRIDGE ENTITIES FOR FAILURE TO COMPLY
WITH THE COURT'S FEBRUARY 20, 2018 ORDER [ECF NO. 9750], WHICH
DIRECTED THEM TO PRODUCE ACCOUNTINGS FOR CLASS MEMBERS'
RETIREMENT FUNDS INVESTED WITH CAMBRIDGE; (2) ORDERING
CAMBRIDGE TO IMMEDIATELY RETURN THE RETIREMENT MONIES AND
EARNINGS THEREON TO CLASS MEMBERS AND TO PRODUCE THE
ACCOUNTINGS; (3) APPOINTING AN ACCOUNTANT, WHOSE FEES SHALL BE
BORNE BY CAMBRIDGE, TO REVIEW THE ACCOUNTINGS AND REPORT TO
THE COURT AS TO THEIR ACCURACY; (4) COMPELLING CAMBRIDGE TO
DISCLOSE ACCOUNTINGS AND ALL DOCUMENTS RELATED TO NON-
QUALIFIED FUNDS OF CLASS MEMBERS INVESTED WITH CAMBRIDGE;
(5) COMPELLING CERTAIN CURRENT AND FORMER OFFICERS OF
CAMBRIDGE TO SUBMIT TO DEPOSITIONS; AND (6) SETTING A FURTHER
HEARING TO DETERMINE WHETHER OTHER RELIEF IS APPROPRIATE**

As directed by the Court at the Hearing held on April 2, 2018, and as a follow-up to the motion filed by Co-Lead Class Counsel (“Class Counsel”) on January 26, 2018 [ECF No. 9578],¹ seeking various forms of relief regarding the Cambridge Entities, which resulted in this Court issuing an Order on February 20, 2018 [ECF No. 9750], Class Counsel now respectfully moves the Court for an order (1) sanctioning the Cambridge Entities² for failure to comply with the Court’s February 20, 2018 Order, which directed them to produce accountings for Class Members’ retirement funds invested with Cambridge; (2) ordering Cambridge to immediately return the retirement monies and earnings thereon to Class Members and to produce the accountings; (3) appointing an accountant, whose fees shall be borne by Cambridge, to review the accountings and report to the Court as to their accuracy; (4) compelling Cambridge to disclose accountings and all documents related to non-qualified funds (*i.e.*, non-retirement funds) of Class Members invested with Cambridge; (5) compelling certain current and former

¹ The full title of the motion filed on January 26, 2018 is Co-Lead Class Counsel’s Motion for an Order (1) Prohibiting the Cambridge Entities from Seeking Repayment of Advances to Class Members related to Assignment Agreements through means other than Those Identified in the Court’s December 8, 2017 Explanation and Order [ECF No. 9517], and from Spreading Misinformation concerning the Explanation and Order; (2) Requiring Corrective Disclosures; (3) Compelling Production by the Cambridge Entities of All Documents relating to Class Members’ Retirement Funds Being Held by Them and Accountings as to Such Funds; and (4) Directing the Cambridge Entities to Return to Class Members Their Retirement Funds Held as Collateral related to Assignment Agreements, along with Earnings and Interest Thereon (“Motion to Prohibit Violation of December 8th Order” or “Motion to Prohibit”) [ECF No. 9578].

² The “Cambridge Entities” or “Cambridge” include the following: Cambridge Capital Group, LLC; Cambridge Capital Advisors LLC; Cambridge Capital Partners, LP; Cambridge Capital Group Equity Option Opportunities, LP; Cambridge Capital Holdings; Cambridge Capital Funding, Inc.; Your Case, LLC; and their present and former directors, officers, partners, employees, contractors, agents, consultants, affiliates, successors and assigns, including, but not limited to Addys Walker, Gail Milon, and Phillip T. (“Tim”) Howard.

officers of Cambridge to submit to depositions; and (6) setting a further hearing to determine whether other relief is appropriate.

Class Counsel respectfully requests that the Court issue an order consistent with the proposed order submitted herewith.

Dated: May 8, 2018

Respectfully submitted,

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Co-Lead Class Counsel

CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the foregoing motion, along with the supporting documents, was served electronically via the Court's electronic filing system on the date below upon all counsel of record in this matter. Because neither (former) counsel for the Cambridge Entities, Mr. Black, nor Mr. Howard has entered his appearance in this action, they, as well as Ms. Milon, Mr. Walker and Ms. Koons and counsel who Mr. Howard previously identified as representing him, are being served via Federal Express Overnight Mail (and via email where an email address is available) at the below addresses:

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Dated: May 8, 2018

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